

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.) CRIMINAL NO. 21-mj-7093-MAB
)
DEVIN R. WADE, JR.)
)
Defendant.) Title 18,
) United States Code,
) Section 922(g)(1)
)

CRIMINAL COMPLAINT

I, Matthew Inlow, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief:

COUNT 1

Felon in Possession of a Firearm

On or about May 19, 2021, in St. Clair County, within the Southern District of Illinois,

DEVIN R. WADE JR.,

defendant herein, knowingly possessed a firearm in and affecting commerce, that is, a Springfield Armory, Model XD-45ACP, .45 ACP Caliber Pistol bearing serial number GM447714, having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, and knowing that he had been convicted of such a crime, in violation of Title 18, United States Code, Section 922(g)(1) and 924(a)(2).

AFFIDAVIT

Your affiant is a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) currently assigned to the Fairview Heights, Illinois Field Office and has been so employed since September 2001. Your affiant was previously employed as a United States

Secret Service Uniformed Division Police Officer from November of 2000 through September of 2001. Your affiant is responsible for investigating violations of federal firearms laws, including Title 18 U.S.C. Section 922(g)(1), making it unlawful for any person who has been convicted of a crime punishable by more than one year in prison to possess a firearm, which affects or is transported in interstate commerce.

The statements contained in this affidavit are based on the investigation of your Affiant, as well as information derived from reports and interviews of the law enforcement officers and witnesses named herein. In support of this Complaint, your Affiant states as follows:

1. On May 19, 2021, at approximately 8:30 a.m., I was working along with the United States Marshals Fugitive Task Force to execute arrest warrants and probation warrants. Specifically, the United States Marshals Fugitive Task Force was assisting the Illinois State Police by executing a St. Clair County Arrest Warrant for Devin R. WADE JR for charges of Unlawful Possession of Firearm Ammunition by Felon.
2. WADE's residence was identified as 1114 Cleveland Avenue, East Saint Louis, Illinois.
3. On May 19, 2021, agents arrived at 1114 Cleveland Avenue, East Saint Louis, Illinois and knocked on the door announcing "Police" in an attempt to make contact with WADE. Law Enforcement began to force entry into the residence announcing their presence as Law Enforcement. WADE was immediately seen laying on the couch right inside the door to the right along the front wall of the interior of the residence. WADE complied with directions given to him by Law Enforcement and was taken into custody without incident. Law Enforcement secured the residence for officer safety to make sure that no one else was hiding in the residence. Law Enforcement observed a Springfield Armory Pistol laying on the couch in plain view right where WADE had been laying when he was

first observed by Law Enforcement. That firearm was described as a Springfield Armory, Model XD-45ACP, .45 ACP Caliber Pistol bearing serial number GM447714 which was loaded with a round in the chamber and ammunition in the magazine. Law Enforcement also observed several firearms magazines laying in plain view in different areas of the front room of the residence and in the kitchen of the residence. Law Enforcement also observed several firearms boxes laying in plain view in the front room of the residence and one in the 2nd room which was a bedroom. Law Enforcement also observed laying in plain view a small plastic bag containing an unknown white powdery substance and a paper plate covered with a white powdery substance in the front room of the residence where WADE had been observed. Law Enforcement also observed a delivery type bag that was open in plain view that contained several plastic bags of suspected marijuana.

4. WADE was interviewed by Law Enforcement and informed Agents that he did not know about anything that was located in his residence. WADE then told Law Enforcement that he did not want to speak with Law Enforcement anymore.
5. On May 19, 2021, SS/A Inlow conducted an Interstate NEXUS examination on the Springfield Armory, Model XD-45ACP, .45 ACP Caliber Pistol bearing serial number GM447714. SS/A Inlow determined that this particular firearm was manufactured in the Country of Croatia by HS Produkt.
6. WADE has been previously convicted of a felony punishable by imprisonment for a term exceeding one year. WADE was sentenced to the Illinois Department of Corrections for St. Clair County Illinois Criminal Case Number 18-CF-124 Aggravated Fleeing/2 plus traffic devices.

FURTHER YOUR AFFIANT SAYETH NAUGHT.

MATTHEW INLOW Digitally signed by MATTHEW INLOW
Date: 2021.05.19 14:16:18 -05'00'

MATTHEW R. INLOW
Special Agent
Bureau of Alcohol, Tobacco, Firearms and
Explosives

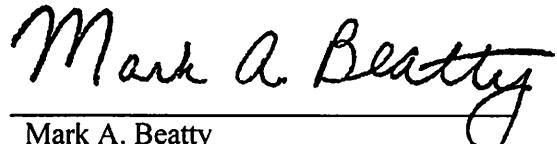
STEVEN D. WEINHOEFT
United States Attorney



Laura Reppert
Assistant United States Attorney

State of Illinois)
)
County of St. Clair)

Sworn on the 19th day of May 2021, in East Saint Louis, Illinois, within the Southern
District of Illinois.



Mark A. Beatty
United States Magistrate Judge